

November 5, 1985

CD-85-15 (LD)

Dear Manufacturer:

SUBJECT: Explanation of EPA Certification Procedures

Several countries have recently adopted motor vehicle emissions regulations which allow the sale of vehicles conforming to U.S. emissions standards and regulations. This letter explains the meaning of EPA's certificate of conformity and the level of review EPA conducts regarding all information required for submission. This information may facilitate the approval process in those countries requesting copies of officially signed documents confirming the compliance of your product with U.S. emission standards.

Pursuant to section 206 of the Clean Air Act (42 U.S.C. 2525), EPA issues a certificate of conformity for each engine family and evaporative emissions family combination. This certificate is issued upon review by EPA of the manufacturer's application for certification and determination that the vehicles described in that application conform to the requirements of the Federal certification regulations as described in 40 CFR Part 86 of the United States Code of Federal Regulations. Manufacturers may not enter a vehicle into commerce (including offering it for sale) without such a certificate. A sample copy of a certificate of conformity is enclosed.

EPA does not necessarily review and does not approve every page of a manufacturer's application. Most manufacturers' applications are processed under the abbreviated certification review procedures outlined in 40 CFR 86.080-12.

Under these procedures, EPA reviews all emission test results submitted by the manufacturer. After this review, EPA may request a confirmatory test to verify the manufacturer's test results. This confirmatory test is almost always run at EPA's own laboratory. Alternatively, EPA will determine that it is unnecessary to conduct a confirmatory test. In the latter cases, the manufacturer's data are accepted as official data.

EPA occasionally will inspect a manufacturer's test facility and testing equipment. However, we rely primarily upon confirmatory testing as our means to assure manufacturers'

laboratories are producing correct results. A number of vehicles are subjected to confirmatory testing on a random basis. If we find a manufacturer's laboratory is not satisfactorily correlating with EPA's, we increase our confirmatory testing percentage for that manufacturer as well as initiate investigations of the problem (including laboratory inspections if necessary).

Other information required by 40 CFR Part 86 is reviewed by EPA on a spot check basis under the abbreviated certification review procedures. Any discrepancy found in a last minute spot check could jeopardize certification and, hence, create expensive delays in production schedules. In response to this very high risk, we have found the manufacturers tend to run very rigorous internal audit programs to assure compliance with all requirements. This, in turn, has made it possible for EPA to reduce its level of routine review to that embodied in our abbreviated certification procedures. Manufacturers also tend to consult with EPA on special issues well in advance of production to avoid delays which may arise as a result of our audits.

The certificate of conformity is issued only after EPA reviews the application for certification to determine that all basic required information has been submitted, completes all desired spot checks, assures no unresolved discrepancies are outstanding, and determines that all vehicle test results conform with the standards. The certificate of conformity, as depicted in the enclosed example, is the only officially signed document the manufacturer must receive from EPA to be able to introduce vehicles into commerce. This document is signed by the Director of the Certification Division, Office of Mobile Sources.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

Enclosure stored as CD8515.PCX